

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
(PHILADELPHIA)

IN RE:

Tatyna Petrosov aka Tanya Petrosov

Debtor.

CHAPTER 13

CASE NO.: 19-16061-amc

**RESPONSE TO MOTION OF DEBTOR FOR DETERMINATION OF FINAL CURE
AND MORTGAGE PAYEMNT**

TO THE HONORABLE JUDGE ASHELY M. CHAN:

COMES NOW, NewRez LLC d/b/a Shellpoint Mortgage Servicing as servicer for MEB Loan Trust III (the “Creditor”), hereby files its Response to Motion of Debtor for Determination of Final Cure and Mortgage Payment (the “Motion”) filed on December 2, 2024 (Doc 161), and responds as follows:

PRE-PETITION MORTGAGE ARREARAGE

1. The Creditor states that its pre-petition arrearage claim has been satisfied.

ONGOING “CURRENT” MONTHLY MORTGAGE PAYMENTS

2. The Creditor agrees that the ongoing monthly mortgage payments are not current and the debtors owes for the months of December 15, 2023 to December 15, 2024 in the amount of \$392.96 each for a total of \$5,108.48 with \$383.00 in suspense for a total due of \$4,725.48. See attached the post-petition ledger.

Respectfully submitted.

By: /s/ Michael J. Shavel

Michael J. Shavel, Esq.

Hill Wallack LLP

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Yardley, PA 19067

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ATTORNEYS FOR NewRez LLC d/b/a
Shellpoint Mortgage Servicing as servicer for
MEB Loan Trust III

Post-Petition Due date	Date Received	Amount Received	Amount Due	Suspense Application	Suspense Balance
10/15/2019	11/11/2019	\$397.87	\$392.96	\$ 4.91	\$ 4.91
11/15/2019	12/10/2019	\$397.87	\$392.96	\$ 4.91	\$ 9.82
12/15/2019	1/27/2020	\$397.87	\$368.99	\$ 28.88	\$ 38.70
1/15/2020				\$ -	\$ 38.70
2/15/2020				\$ -	\$ 38.70
3/15/2020				\$ -	\$ 38.70
4/15/2020				\$ -	
5/15/2020	6/1/2021	\$6,756.48	\$734.62	\$ 6,021.86	\$ 6,021.86
6/15/2020			\$734.62	\$ (734.62)	\$ 5,287.24
7/15/2020			\$734.62	\$ (734.62)	\$ 4,552.62
8/15/2020			\$734.62	\$ (734.62)	\$ 3,818.00
9/15/2020			\$734.62	\$ (734.62)	\$ 3,083.38
10/15/2020			\$734.62	\$ (734.62)	\$ 2,348.76
11/15/2020			\$392.96	\$ (392.96)	\$ 1,955.80
12/15/2020			\$392.96	\$ (392.96)	\$ 1,562.84
1/15/2021			\$392.96	\$ (392.96)	\$ 1,169.88
2/15/2021			\$392.96	\$ (392.96)	\$ 776.92
3/15/2021			\$392.96	\$ (392.96)	\$ 383.96
4/15/2021	6/23/2021	\$392.96	\$392.96	\$ -	\$ 383.96
5/15/2021	7/23/2021	\$392.00	\$392.96	\$ (0.96)	\$ 383.00
6/15/2021	8/19/2021	\$392.96	\$392.96	\$ -	\$ 383.00
7/15/2021	9/22/2021	\$392.96	\$392.96	\$ -	\$ 383.00
8/15/2021	10/20/2021	\$392.96	\$392.96	\$ -	\$ 383.00
9/15/2021	11/24/2021	\$392.96	\$392.96	\$ -	\$ 383.00
10/15/2021	12/29/2021	\$392.96	\$392.96	\$ -	\$ 383.00
11/15/2021	2/3/2022	\$392.96	\$392.96	\$ -	\$ 383.00
12/15/2021	3/3/2022	\$392.96	\$392.96	\$ -	\$ 383.00
1/15/2022	3/24/2022	\$392.96	\$392.96	\$ -	\$ 383.00
2/15/2022	5/3/2022	\$392.96	\$392.96	\$ -	\$ 383.00
3/15/2022	6/1/2022	\$392.96	\$392.96	\$ -	\$ 383.00
4/15/2022	7/1/2022	\$392.96	\$392.96	\$ -	\$ 383.00
5/15/2022	7/29/2022	\$392.96	\$392.96	\$ -	\$ 383.00
6/15/2022	8/22/2022	\$392.96	\$392.96	\$ -	\$ 383.00
7/15/2022	9/21/2022	\$392.96	\$392.96	\$ -	\$ 383.00
8/15/2022	11/7/2022	\$392.96	\$392.96	\$ -	\$ 383.00
9/15/2022	12/8/2022	\$392.96	\$392.96	\$ -	\$ 383.00
10/15/2022	1/6/2023	\$392.96	\$392.96	\$ -	\$ 383.00
11/15/2022	3/15/2023	\$392.96	\$392.96	\$ -	\$ 383.00
12/15/2022	5/4/2023	\$392.96	\$392.96	\$ -	\$ 383.00

*AO En

[illegible]

Loan Number	XXXXXXXXXX
Debtor	Tatyna Petrosov
BK filed date	9/26/2019
BK Case #	19-16061
Loan Acquired	
Post Next Due	12/15/2023
Suspense	\$ 383.00

entered. Payments from 5/5/15 to 10/15/2020 to be at the amount of \$734.62 to include arrears payment

Due Date	Due Amount	# Months	Total Due
12/15/2023-12/15/2024	\$392.96	13	\$ 5,108.48
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
			\$ -
		Subtotal	\$ 5,108.48
		Less Unapplied	\$ 383.00
		Total to bring current	\$ 4,725.48

\$	776.92	
\$	(392.96)	
\$	383.96	unapplied

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CERTIFICATE OF SERVICE

I hereby certify that service was made upon all interested parties, indicated below of Response to Debtor's Motion to Determination of Final Cure and Mortgage Payment of NewRez LLC d/b/a Shellpoint Mortgage Servicing as servicer for MEB Loan Trust III on December 18, 2024:

Tatyna Petrosov aka Tanya Petrosov
751 Magee Avenue
Philadelphia, PA 19111
Debtor
Via Regular Mail

Bradly E Allen
Law Offices of Bradly Allen
7711 Castor Avenue
Philadelphia, PA 19152
Counsel for Debtor
Via ECF

Office of the U.S. Trustee
Robert N.C. Nix Federal Building
Suite 320
Philadelphia, PA 19107
United States Trustee
Via ECF

Scott F. Waterman
2901 St. Lawrence Ave.
Suite 100
Reading, PA 19606
Chapter 13 Trustee
Via ECF

By: /s/ Leslie M. DeJesus